

October 29, 2012

REC'D DEC 2 7 2012 APCO

## CERTIFIED MAIL # 7011 0470 0001 5490 3660 RETURN RECEIPT REQUESTED

Kansas Department of Health & Environment Bureau of Air 1000 SW Jackson Street, Suite 310 Topeka, Kansas 66612-1366

RE:

Initial Notification - 40 CFR 60, Subpart JJJJ New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal

Combustion Engines (SI ICE)

The following non-certified engine over 500 horsepower was purchased by Compressor Systems, Inc. (CSI) and notice is hereby given pursuant to NSPS Subpart JJJJ requirements in 40 CFR 60.4245(c). CSI owns this engine for lease and it may be sold or installed for operation at various locations throughout the United States.

It is stated in §60.4245(c) that "owners and operators" of stationary spark ignition internal combustion engines (SI ICE) greater than or equal to 500 HP that are not manufacturer-certified to meet emission standards in §60.4231 must submit an initial notification. Although this notification requirement clearly applies to operators, CSI is a SI ICE compressor leasing company that owns but does not control the affected SI ICE or stationary source of which the affected SI ICE is a part. Accordingly, the applicability of initial notification requirements to CSI is unclear, although CSI believes that practicable assignment of this is to the operator/permit holder because all required initial notice information may not be currently available to a SI ICE owner or leasing company within the initial notification submittal deadline requirement. CSI elects to submit this initial notification as a precautionary measure.

| Reference     |                          |  |
|---------------|--------------------------|--|
| 60.4245(c)(1) | Owner Name:              | Compressor Systems, Inc. (CSI)             |
|               | Operator Name:           | Postrock Midcontinent Prod., LLC           |
| 60.4245(c)(2) | Current Address of       | Douglas CDP                                |
|               | Affected Source:         | Wilson County, Kansas                      |
| 60.4245(c)(3) | Engine Information:      | Make & Model: Caterpillar G3412CLELCR      |
|               |                          | Engine Family: G3400 Lean Burn Series      |
|               |                          | Serial Number: 6ZM02826 - CSI Unit #411270 |
|               |                          | Date of Manufacture: 11-30-2006            |
|               |                          | Maximum Engine Power: 637 HP @ 1800 RPM    |
|               |                          | Engine Displacement: 1,649 Cubic Inches    |
| 60.4245(c)(4) | <b>Emissions Control</b> | Air-Fuel Ratio Controller, Lean Burn       |
|               | Equipment                | Technology                                 |
| 60.4245(c)(5) | Fuel Used:               | Field Gas                                  |

To the best of my understanding, this letter meets the notification requirements of 40 CFR 60.4245(c) and, unless notified by regulatory agencies, it is the understanding of CSI that this letter constitutes approval for NSPS compliance. I may be telephoned at (432) 571-8426 if you have any questions.

Thank you,

David O'Leary EHS Director

Compressor Systems, Inc.

david.oleary@warren-equipment.com

cc:

United States Environmental Protection Agency, Region 7

11201 Renner Blvd. Lenexa, Kansas 66219